REMARKS

Claims 1-38 are pending in the application and stand rejected.

Rejection under 35 U.S.C §102

Claims 1-38 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,687,831 to Albaugh et al. In particular, the Examiner finds that, with regard to claim 1, Albaugh discloses all of the claimed limitations, generally citing to the abstract and figures 7,8, 10-15 and associated descriptions "as broadly interpreted by the examiner." Although it appears questionable whether this rejection can be viewed as designating the particular part relied on as nearly as practicable, as per the requirements posited by 37 C.F.R. 1.104(c)2, Applicants have nonetheless reviewed the reference with great care, paying particular attention to the portions and figures identified by the Examiner, and are compelled to respectfully disagree with the Examiner's characterization of this reference.

For instance, the Examiner alleges that Albaugh discloses the claimed one or more proxy objects being generated in response to commands from the first application by the aforementioned abstract and figures 7,8, 10-15 and associated descriptions "whereas the use of the multiple security enablement's clearly are utilized in a database access environment (i.e. figure 7 and associated description) via a proxy generation/instantiation over the network (i.e. internet), as broadly interpreted by the examiner." With all due respect, the Examiner's interpretation appears so broad as to include seeing elements that are simply not there. More precisely, there is absolutely nothing in Albaugh that could possibly be interpreted by the skilled person as discussing the *generation* of proxy objects, and thus certainly nothing even remotely related to the generation of proxy objects in response to commands from an application that is being executed on a client computer.

There is no doubt that Albaugh discusses a network that includes client proxy objects; however, Albaugh is concerned solely with the establishment of communications between such client proxy objects and server target objects in an environment that has different security requirements for different objects (the "multiple security enablement's" mentioned by the

Examiner). The only thing generated in the system of Albaugh are keys that index information that describes the various server target objects and their security requirements; these keys are generated by connection database objects provided by a object request broker (ORB) (please see col. 8 ll. 25-42 of Albaugh). Thus, Applicants respectfully submit that the Examiner's proffered reasoning that this claim limitation is anticipated by the "proxy generation/instantiation over the network" in Albaugh is simply not supported by the plain language of Albaugh.

A detailed read of Albaugh also reveals no discussion whatsoever of what services the server target objects can provide once communications are established with a client proxy object. Thus, the Examiner allegation that Albaugh discloses the claimed second application receiving proxy objects from the first application, generating a database query based on the proxy objects and the drivers and returning the database query results to the first application, is equally untenable. The Examiner supports this assertion by opining that "whereas the database access encompass the particular database driver objects required for access with the security mechanism located in the logical data/object path (i.e. between the client and server(s) with associated references as accessed across the network via associated ORB processes), as broadly interpreted by the examiner." Erstwhile, there is no such entity as "database driver objects" mentioned in Albaugh, and Applicants frankly have no idea as to what the Examiner is referring to. Applicants understand the Examiner to assert that drivers must by necessity be present somewhere in the system of Albaugh, and are not in disagreement with this limited assertion. However, Albaugh makes no explicit mention of any types of drivers, and thus Applicants strongly disagree that the skilled reader would somehow understand Albaugh to teach the generation of database queries based on proxy objects and drivers capable of being stored on a server.

Furthermore, there is also absolutely no mention of proxy objects being forwarded in the system of Albaugh. Albaugh does teach that connection objects are returned by the ORB to the client proxy objects to be used in communicating with the server target object (col. 8 ll. 17-22). However, these connection objects do not generate any sort of database queries, do not interact with any sort of drivers, and do not return any results of any database queries. As mentioned above, these connection objects *contain* information about the respective server target, and thus could actually best be understood as *being* the database query results being returned by the ORB to the client proxy objects. Of course, the security mechanism is not involved in this transfer, and

thus if the Examiner is likening the ORB of Albaugh to Applicants' second application, then this second application is clearly not separated from the first application by a security mechanism. Applicants note that the Examiner has also not specified what in Albaugh comprises the claimed first application, and thus Applicants contend that there is in fact nothing in Albaugh that does read upon the claimed first application because as previously explained, Albaugh does not teach the generation of proxy objects. As mentioned, only keys are generated, and these keys are generated by base connection interceptor 604 which is part of ORB 600 – i.e. it is part of what the Examiner appears to understand as being the claimed *second* application. In short, there is nothing being generated on the client computers of Albaugh.

In view of all of the above, Applicants respectfully submit that claim 1 is in fact patentable over Albaugh. Should the Examiner disagree, Applicants respectfully request him to clearly and specifically point out where Albaugh discloses each and every feature discussed above in accordance with the requirements posited in 37 C.F.R. 1.104(c)2.

Claims 2-10 depend from claim 1. In view of the above discussion, it is submitted that claim 1 is allowable, and for this reason claims 2-10 are also allowable and are not individually addressed elsewhere herein.

Claims 11, 20, 29 and 30 stand rejected "for the same reasons provided for the claim 1 rejection" and Applicants thus respectfully submit that claims 11, 20, 29 and 30 are in fact patentable over Albaugh for the same reasons as set forth above with respect to the patentability of claim 1.

Claims 12-19 depend from claim 11, claims 21-28 depend from claim 20, and claims 31-38 depend from claim 30. In view of the above discussion, it is submitted that claims 11, 20 and 30 are allowable, and for this reason claims 12-19, 21-28 and 31-38 are also allowable and are not individually addressed elsewhere herein.

Regarding the prior art made of record by the Examiner but not relied upon, Applicants believe that this art does not render the pending claims unpatentable.

In view of the above, Applicants submit that the application is now in condition for allowance and respectfully urge the Examiner to pass this case to issue.

The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account no. 12-0415. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 12-0415.

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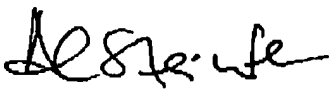
Respectfully submitted,



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